

CHHS Agency HIPAA Workgroup County Issues Sub-Workgroup

Monday, July 9, 2001

Notes:

1. Introductions, prior meeting notes

Ray Reis called the meeting to order. The meeting notes from June 11, 2001, were approved without changes.

2. Consensus Item No. 4

Robert Greenless presented the first draft of Consensus Item No. 4, which discusses the applicability of the privacy rules to the County Human Resources Department. Overall the Workgroup agreed with the content of Consensus Item. Terri Carlson will work with Robert Greenless to revise a portion of the discussion section, and Robert Greenless agreed to reformat the discussion using the Premise-Reasoning-Implications subheadings.

3. Consensus Item No. 2

Meg Sheldon presented a revision to Consensus Item No. 2, expanding the Welfare Department eligibility determination exemption to all the HIPAA rules, not just electronic transactions.

The Workgroup suggested a few changes which Meg agreed to make for the next meeting.

4. Consensus Item No. 3

Ray discussed the uncertainty of whether a business associate agreement type MOU was actually mandated. Until we have done further research, Ray suggested that the sentence inferring that MOUs were mandated be deleted. The Workgroup agreed to this change. Ray will make this revision and reformat the consensus item in the new three-subheading format.

5. Consensus Item No. 1

Jim Watkins presented a much-expanded Consensus Item No. 1, which provides an in-depth discussion of the reasoning for, and implications of generalizing the hybrid entity definition to all the HIPAA rules. The Workgroup suggested some changes, which Jim will incorporate for the next meeting. The Workgroup also formally adopted Jim's format for all Workgroup consensus items.

6. Next meeting

The next Workgroup meeting is July 30, 2001. In addition to reviewing the next round of consensus item revisions, members wanted an open discussions of rules application in areas like child welfare and other multi-disciplinary information sharing situations.